

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

v.

PAULETTE MARTIN, et al.

No. 07-4060

No. 07-4059 (L)

\* \* \* \* \*

**MOTION FOR LEAVE TO FILE  
A SECOND SUPPLEMENTAL JOINT APPENDIX**

Come now Appellant herein, Paulette Martin, by and through her counsel, Michael D. Montemarano, Esq., and Michael D. Montemarano, P.A., as appointed counsel pursuant to the CJA, and on behalf of the other Appellants herein, and with the consent of Daniel Goodman, Esq., USDOJ/Criminal Appeals Section, counsel for Appellee, and does move for leave to file a Second Supplemental Joint Appendix, and in support thereof does state:

1. The Supplemental Joint Appendix was filed on March 8, 2011, in advance of the filing of the final Joint Brief of Appellants, per the instructions of the Court.

2. Due to the size of the Joint Appendix, etc., a Supplemental Joint Appendix was required to be filed, to correct errors by several counsel in the identification of materials for inclusion in the JA. The Joint Appendices total nearly 4000 pages.

3. Lead counsel for Appellants assembled and filed a Supplemental Joint Appendix which included the pages of the record missing from the JA. In so doing, however, two pages of transcript (pp. 50-51) were included from the wrong trial day (June 20), instead of the same numbered pages from the correct day (June 21). These pages now have been submitted as a Second Supplemental Joint Appendix.

4. Lead counsel for Appellants therefore requests that leave be granted, and the Second Supplemental Joint Appendix be accepted for filing.

5. Counsel for Appellant is authorized to state that counsel for Appellee consents to the grant of this relief.

Respectfully submitted,

March 9, 2011

/s/  
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MICHAEL D. MONTEMARANO

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Counsel of Record/CJA Counsel  
For Appellant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or before this 9<sup>th</sup> day of March, 2011, a copy of the foregoing *Motion For Leave to File a Second Supplemental Joint Appendix* was filed via CM-ECF, and served via direct email, on Daniel Goodman, Esq., US Department of Justice, Criminal Appellate Section, 1264 Main Building, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

/s/  
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MICHAEL D. MONTEMARANO